

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE 2,

Plaintiff,

v.

RED ROOF INNS, INC., et al.,

Defendants.

Civil Action No.
1:21-cv-04278

PL Sum. J.

Ex. 073

**PLAINTIFF JANE DOE 2'S AMENDED AND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
DEFENDANT RED ROOF INNS, INC.'S INTERROGATORIES**

Plaintiff Jane Doe 2 (“Plaintiff” or “Jane Doe 2”) hereby provides amended and supplemental objections and responses to Defendant Red Roof Inns, Inc.’s (“Defendant” or “RRI”) Interrogatories (the “Interrogatories”). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff incorporates herein her objections to these Interrogatories served on March 23, 2020, including objections to definitions and instructions. And to the extent Plaintiff discloses identifying information of any Victim of Sex Trafficking, Plaintiff does so subject to the Protective Order entered in this case.

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produce non-privileged documents responsive to discovery requests lodged in this case, subject to her objections.

6.

Please provide a timeline of your Trafficking Occurrences at RRI Smyrna, RRI Atlanta, and the Suburban Extended Stay Chamblee from 2011-2014, with specific reference to the day, month, year. For each occurrence identified, please include: the location of each Trafficking Occurrence; the identity of the organization trafficking you; the name and role of every individual trafficker that assisted or facilitated trafficking you; the names and roles of every hotel personnel, agent, or otherwise that in any way assisted or facilitated each Trafficking Occurrence; the means employed to prevent you from leaving; which, if any, of the other Jane Does filing lawsuits in the United States District Court for the Northern District of Georgia that were also trafficked at the same location for each Trafficking Occurrence; and the names of other victims or witnesses with knowledge for each Trafficking Occurrence.

ORIGINAL RESPONSE TO INTERROGATORY NO. 6: Jane Doe 2

objects to this Interrogatory because the total number identifiable subparts, along with other Interrogatories, exceeds the total permitted by the Federal Rules of Civil Procedure. Jane Doe 2 further objects to this Interrogatory to the extent it calls for information that is protected by the attorney-client privilege, work product doctrine, or any other privilege. Jane Doe 2 will not reveal such information.

Subject to these objections, the foregoing general objections and objections to definitions and instructions, Jane Doe 2 provides the following

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description of her trafficking at the RRI Smyrna, RRI Atlanta, and Suburban Extended Stay Chamblee. Jane Doe 2 reserves the right to amend or supplement this description as discovery progresses.

Jane Doe 2 was trafficked primarily by [REDACTED] (a/k/a CB), [REDACTED] (a/k/a Quan), and Anthony Shivers (a/k/a Ant) from about 2011 through 2014. Jane Doe 2 was also trafficked by Bagz for about a week. She met CB through Jane Doe 4 outside of the Microtel Inn & Suites on 1840 Corporate Blvd in Atlanta. At some point, she got into CB's car. He had a man with him known as "Big E." CB the hit Jane Doe 2 with a pistol while she was in the back of his car and told her she was "not going anywhere." She passed out and when she awoke, she was in the Suburban Extended Stay Chamblee where she stayed for two to three days.

CB was associated with a group known as PIVIP, which stood for Pimps in Very Important Places. Other members of this group included Quan, Ant, Bagz, Nitty, and Diablo. The PIVIP group had shirts made at a mall kiosk and would have the victims wear them from time to time when they went out to a club together. Jane Doe 2 believes Jane Doe 1 and victims named [REDACTED] [REDACTED] and [REDACTED] would have worn these shirts. PIVIP had a meeting location called the "Studio" off of Pharr Road near a PNC bank.

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Jane Doe 2 was trafficked at the Suburban Extended Stay Chamblee by [REDACTED] (a/k/a Quan) and [REDACTED] (a/k/a CB) from about 2011 to the 2014. She estimates she came to this hotel hundreds of times during that period, and each time, she would usually stay about four days at time. Jane Doe 2's longest stay at this hotel lasted between five to seven days. During the time Jane Doe 2 was trafficked at this hotel, Jane Doe 1 was also trafficked here. Other victims trafficked at this hotel include a girl named [REDACTED] [REDACTED] [REDACTED] and [REDACTED]. Jane Doe 2 believes CB may have reserved a room at some point, but Jane Doe 2 does not know what name CB would have used to do so (although it may have been his own name). Later when Jane Doe 2 was trafficked by Quan, Jane Doe 2 used her actual ID to reserve rooms at this hotel (and at the Atlanta RRI). CB also had with him an associate named Big E with him. And Quan and CB had another friend, who was [REDACTED] trafficker, who Jane Doe 2 believes lived at this hotel.

Jane Doe 2 recalls that a front desk employee of the Suburban Extended Stay Chamblee would call their room if there were police in the area or if there was some other threat to the sex trafficking operation. In exchange for serving as this type of lookout, the employee would receive money from the trafficker. Jane Doe 2 knows this because she herself the traffickers made her give the employee the money.

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Jane Doe 2 also recalls an African American male maintenance worker at the Suburban Extended Stay Chamblee with whom she interacted. He had very short hair (almost bald, called a “skin fade”) and was perhaps in his 30s or early 40s. She was once left alone at the hotel and then approached this worker to use his phone to call for help or to get a ride away from the hotel. She could not use her own cell phone because CB, her trafficker, was monitoring her cell phone usage. The worker seemed inclined to help at first, but then declined. Jane Doe 2 later snuck out of the hotel to a nearby Pizza Hut to use the phone but CB called her on the cell phone she had with her so she rushed back to the hotel. When she arrived, she learned that the maintenance employee had told CB that Jane Doe 2 had asked for a ride. Because Jane Doe 2 had tried to use the phone or get a ride to escape, CB beat her. Jane Doe 2 also recalls that while she stayed at the Suburban Extended Stay Chamblee, the housekeeping did not visit the room often.

Jane Doe 2 was trafficked at the RRI Smyrna from 2011 to 2014 by Anthony Shivers (a/k/a Ant). Quan would drop her off at this hotel with

██████████ When Jane Doe 2 was trafficked at the Smyrna Red Roof Inn, the hotel often put her and other trafficking victims in the same set of rooms in the back of the building. Generally, Jane Doe 2 would see at most 10 buyers each day at this hotel. And during this time, there were on average 10 to 12

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other traffickers at the hotel, each with 1 to 3 victims. There were often more than 100 buyers at the hotel each day.

Jane Doe 2 recalls one employee at the RRI Smyrna who assisted the traffickers. His name was Forrest Castille. Jane Doe 2 recalls one trafficker, Anthony Shivers, paying Mr. Castille in cash to serve as a lookout. Mr. Castille would call the room presumably to warn Mr. Shivers about potential law enforcement activity or others in the vicinity that might report the trafficking, and in response, Mr. Shivers would order Jane Doe 2 and other sex trafficking victims in the room to remain quiet for a period of time.

For many years, the Smyrna Red Roof has had a policy, prominently displayed at the front desk and the night window to the front office, stating, “NO REFUNDS AFTER 15 MINUTES.” This policy was featured prominently in numerous publicly-available online reviews, and any auditor or inspector of the hotel would have seen it on display.

Jane Doe 2 was trafficked at the Atlanta RRI by Jerome Rutledge (a/k/a Quan) and Jayson Johnson (a/k/a CB) from about 2011 to the 2014. She estimates she came to this hotel dozens of times during that period, and each time, she would usually stay about two days at time. Jane Doe 2’s longest stay at this hotel lasted at most three days. During the time Jane Doe 2 was trafficked at this hotel, Jane Doe 1 was also trafficked here.

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██████ and ██████ were also trafficked there. Jane Doe 2 believes CB or Quan may have reserved a room at some point, but Jane Doe 2 does not know what name they would have used to do so (although it may have been their own names). Later when Jane Doe 2 was trafficked by Quan, Jane Doe 2 used her actual ID to reserve rooms at this hotel. Just as with other hotels, CB would have had with him an associate named Big E with him.

While Jane Doe 2 was trafficked at these three hotels, she and other trafficking victims exhibited numerous well-known and visible signs of a sex trafficking victim, including physical deterioration, malnourishment, poor hygiene, fatigue, sleep deprivation, injuries, a failure to make eye contact with others, lack of control and possession of money, physical evidence of beatings by her trafficker, and monitoring by her traffickers. While Jane Doe 2 was trafficked at these hotels, her room, and the rooms of other victims, evidenced numerous well-known and visible signs of sex trafficking. Frequently, the trash cans in the rooms in which Jane Doe 2 was trafficked contained an extraordinary number of used condoms. And on occasion, the toilet would clog because of so many flushed condoms. The rooms also contained multiple cell phones. She also frequently requested an excessive amount of towels from housekeeping.

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Multiple other employees of these three hotels participated in, assisted and facilitated the sex trafficking that occurred at these three hotels. At this time, Jane Doe 2 does not recall the names of each of these employees, and in fact may have never known such employees' names.

7.

Please identify and describe in reasonable detail every injury, illness, condition, inability to function, diagnosis received (from any individual or facility identified below in Interrogatory No. 7 (sic)) or anything else that you contend was directly and/or proximately caused by the events alleged in your Amended Complaint, the duration each existed, and to what extent you have recovered from each.

ORIGINAL RESPONSE TO INTERROGATORY NO. 7: Jane Doe 2

objects to this Interrogatory as vague and confusing because it asks for detail of every "inability to function." Jane Doe 2 further objects to this Interrogatory to the extent it is premature because it calls for information subject to disclosure under Federal Rule of Civil Procedure 26(a)(2). Plaintiff will disclose such documents and information at the appropriate time and to the extent required under the Federal Rules, this Court's Local Rules, and any scheduling orders of this Court.

Subject to these objections and the foregoing general objections and objections to definitions and instructions, Jane Doe 2 states that she suffered numerous physical, emotional, psychological, and mental harms due to the

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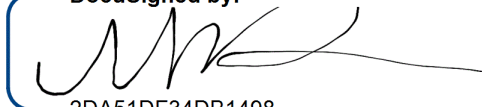
VERIFICATION

The answers set forth in **PLAINTIFF JANE DOE 2'S AMENDED AND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to

interrogatories is true and correct to the best of my knowledge, information and belief.

This ____ day of June, 2022.

DocuSigned by:

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Jane Doe 2